



February 5, 2016

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MEMO ENDORSED**VIA ECF**

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of Defendants Sana Bell, Inc. and Sanabel al Kheer, LLC (collectively "Sanabel"), I write to provide the following Supplemental Response to Plaintiffs' Motion to Compel filed on November 13, 2015 (EC 3127) and to the Court's request in its December 29, 2015 Order (EC 3176) that counsel for Sanabel "set forth whether any Sanabel representative currently is authorized to direct Sanabel's legal representation in these proceedings."

In short, undersigned counsel has exhausted all avenues of attempted communication with his client for approximately the past twelve (12) months, including attempts to contact his client's known representative, Abdelmoniem M. El-Hillali, via phone, mail, text message and in person at his last known address on numerous occasions (most recently on February 4, 2016) – each without success. Area hospitals have been contacted to determine whether his client's representative was admitted to the hospital and death records were also reviewed but turned up nothing.

As a result, Sanabel's counsel is not in a position to be able to provide a further Response to Plaintiff's Motion to Compel beyond what it provided on December 21, 2015 (EC 3173) or to the Court's request that counsel set forth whether "any Sanabel representative currently is authorized to direct Sanabel's legal representation in these proceedings."

Given the status as it stands currently, Sanabel's counsel cannot ethically advocate a particular position in response to any other of Plaintiffs' arguments (many of which are raised for the first time in Plaintiffs' Motion to Compel) because Sanabel's counsel is not currently able to ascertain Sanabel's position on these matters, all of which are heavily factually intensive.

Therefore, once again, out of an abundance of caution and in order to protect Sanabel's interests to the fullest extent possible (especially in the face of requests for sanctions and/or a default), Sanabel's counsel respectfully requests an extension of sixty (60) days within which to supplement this Response again in order to provide Sanabel's counsel with more time to communicate with his client's representative.

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Denied.
There is no
reason to
believe that Sanabel
would enable Mr. Manning
to communicate with
his client.
Affairs, USMS,
2/8/16



I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 5, 2016

Christopher C. S. Manning
Counsel for Sana Bell, Inc. and Sanabel al Kheer, LLC

cc: The Honorable George B. Daniels (via USPS)
MDL-1570 Counsel of Record (via ECF)